

HANCOCK COUNTY, OHIO
FILED

2013 MAY 17 P 341

CLERK OF COURT
HANCOCK COUNTY

IN THE COMMON PLEAS COURT OF HANCOCK COUNTY, OHIO

Gary L. Bibler :
12169 CR 12 :
Rawson, Ohio 45881 : Case No. 2013 CV 243

And :

Yvonne M. Bibler :
12169 CR 12 :
Rawson, Ohio 45881 :

Plaintiffs :

v.

**COMPLAINT WITH JURY DEMAND
ENDORSED HEREON**

Jill D. Stevenson :
420 W. Lima Street, Ste. 4 :
Findlay, Ohio 45840 :

and :

City of Findlay :
c/o Don Rasmussen, City Law Director :
314 W. Crawford St. :
Findlay, Ohio 45840 :

Defendants :

FACTS COMMON TO ALL CLAIMS

1. At all times pertinent hereto, Defendant Jill D. Stevenson was and is a resident of the City of Findlay, County of Hancock and State of Ohio.
2. At all times pertinent hereto, Plaintiffs Gary L. Bibler and Yvonne M. Bibler, husband and wife, were and are residents of the County of Hancock and State of Ohio.



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3. On or about the 27th day of May, 2011, Plaintiff Gary Bibler was the owner and operator of a 1991 Ford F15 truck, traveling eastbound on East Sandusky Street, Findlay, Ohio approaching the intersection of Wilson Street.

4. On the same date and at the same time, the Defendant, Jill Stevenson was the owner and operator of a 2002 Buick Regal, traveling northbound on Wilson Street, when she failed to yield at the stop sign on the corner of Wilson Street and East Sandusky Street, and collided with Plaintiff Gary Bibler's vehicle.

5. At the time of the collision, the Defendant, City of Findlay, had negligently allowed view of the stop sign controlling traffic at the intersection of Wilson and Sandusky Streets to be obstructed.

CLAIM I.

6. Plaintiffs for their first claim readopt all the allegations contained in Paragraphs 1 through 5 as if fully rewritten herein.

7. As a direct and proximate result of Defendants' continued negligence, Plaintiff Gary Bibler suffered injuries to his back.

8. As a direct and proximate result of Defendants' negligence Plaintiff Gary Bibler incurred substantial medical expenses and will continue to incur such expenses in the future.

9. Plaintiff Gary Bibler, as a result of the negligence of Defendants, has suffered pain, suffering and loss of enjoyment of life, all of which are permanent in nature and will continue to cause him pain and disability in the future.

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CLAIM II.

10. Plaintiffs for their second claim readopt all the allegations contained in Paragraphs 1 through 10 as though fully rewritten herein.

11. As a direct and proximate result of the negligence of Defendant, which caused the injuries to Plaintiff Gary L. Bibler, his Wife, Plaintiff Yvonne M. Bibler, has suffered the loss of the consortium of her husband.

12. As a result of the personal injury suffered by the Plaintiffs, each has been subjected to great emotional distress and such emotional distress will continue into the future and is permanent.

WHEREFORE, as to their First Claim, Plaintiffs demand judgment against Defendants in an amount in excess of Twenty-five Thousand Dollars (\$25,000); as to their Second Claim, Plaintiffs demand judgment against Defendants in an amount in excess of Twenty-five Thousand Dollars (\$25,000); for their costs herein expended; and for any such other relief as may been deemed just and equitable in the premises.

Common Pleas Court
Co., do hereby certify
and correct copy of the
Complaint

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Charles H. Kuenzli, Jr.
Clerk of the Common Pleas Court
Annette Spencer

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Attorneys for Plaintiffs

JURY DEMAND

Plaintiffs hereby demand a trial by jury of the issues herein.

DRAKE, PHILLIPS, KUENZLI & CLARK
By: William E. Clark (0006702)

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Attorneys for Plaintiffs